



User: DoxAdmin - DOE-Directives Administrator - Comments Report

Document type: DOE-Directives

Document: DOE G 580.1-1A, Personal Property, Review and Comment

**Overall Comments****Suggested comment from Debra Smiley for Bonneville Power Administration**

BPA appreciates the opportunity to comment on draft DOE Guide 580.1-1A, Personal Property. BPA has no edits or comments to the draft Order as written.

**Suggested comment from Jeannie Berens for National Renewable Energy Laboratory**

No Comment

**Suggested comment from Marilyn Jacobs for Headquarters EM****Included comments:****Andrea Cooper for Carlsbad Field Office**

No Comment

SME [renato.mercado@rl.doe.gov](mailto:renato.mercado@rl.doe.gov)

Suggest to add a section or paragraph on the use of "Voluntary Consensus Standards (VCS)".

Suggest to add a section on "Vehicles" and also the required reporting requirement.

**Bobby Williams for Office of River Protection**

No Comment

SME [timothy.armstrong@srs.gov](mailto:timothy.armstrong@srs.gov)

Looks like you have some repeated chapters in section IV and V

SME [richard.reffner@wv.doe.gov](mailto:richard.reffner@wv.doe.gov)

No Comment

**Suggested comment from Andrea Cooper for Carlsbad Field Office**

No Comment

**Suggested comment from Mark Holowczak for East Tennessee Technology Park - UCOR (URS | CH2M)**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Ronald Cavalier for Hanford - Mission Support Alliance (MSA)**

This package represents the official, consolidated comments of **RJ Cavalier**

No Comment

**Suggested comment from Carla Campbell for Idaho National Laboratory - ICP-EM**

No Comment

**Suggested comment from Gary Richards for Oak Ridge National Laboratory - Isotek Systems, LLC**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Bobby Williams for Office of River Protection**

No Comment

**Suggested comment from Annette Erdman for Richland Operations Office****Included comments:**

SME [renato.mercado@rl.doe.gov](mailto:renato.mercado@rl.doe.gov)

Suggest to add a section or paragraph on the use of "Voluntary Consensus Standards (VCS)".

Suggest to add a section on "Vehicles" and also the required reporting requirement.

**Suggested comment from Tracy Williamson for Savannah River Operations Office (EM)****Included comments:**

SME [timothy.armstrong@srs.gov](mailto:timothy.armstrong@srs.gov)

Looks like you have some repeated chapters in section IV and V

**Suggested comment from Mark Schwiippert for West Valley Demonstration Project Office**

**Included comments:**

**SME richard.reffner@wv.doe.gov**

No Comment

**Suggested comment from Bill Schwartz for Headquarters HG**

This package represents the official, consolidated comments of **Poli A. Marmolejos, Director**

No Comment

**Suggested comment from Emily Jackson for Headquarters LM**

No Comment

**Suggested comment from Cathy Tullis for Headquarters NA**

This package represents the official, consolidated comments of **Cathy Tullis**

**Included comments:**

**Vanessa Scott for NA-70 Defense Nuclear Security**

1. There should be a definition of Personal Property somewhere in the beginning of the guide. Need to understand what is being managed and what items would be considered supplies/consumables.

2. Glossary is not in alphabetic order

**Response:**

*Accept with Modifications*

Personal Property was added into the definition and glossary was placed in alphabetic order

**Suggested comment from Robert Park for Lawrence Livermore National Laboratory**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Walter Cyganowski for Livermore Field Office**

No Comment

**Suggested comment from Annamaria Cruz for Los Alamos Field Office**

No Comment.

**Included comments:**

**SME mshepherd@lanl.gov**

This Guide is not in LANL's prime contract but it does serve as a good reference guide for areas that are not covered in the Order or where additional clarification is required. In addition, the NNSA Subliminal for 580.1A addresses ASM-PM's concerns with the original Order and this guide.

**Suggested comment from Yvonne Salaz for Los Alamos National Laboratory**

This package represents the official, consolidated comments of **Y. Salaz, LANL DPC**

**Included comments:**

**SME mshepherd@lanl.gov**

This Guide is not in LANL's prime contract but it does serve as a good reference guide for areas that are not covered in the Order or where additional clarification is required. In addition, the NNSA Subliminal for 580.1A addresses ASM-PM's concerns with the original Order and this guide.

**Suggested comment from Buffy Wells for NA-20 Defense Nuclear Nonproliferation**

This package represents the official, consolidated comments of **ann madison**

No Comment

**Suggested comment from Donna Barnette for NA-30 Naval Reactors**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from David Freshwater for NA-40 NNSA Emergency Operations**

This package represents the official, consolidated comments of **David Freshwater, NA-40 DPC**

The Office of Emergency Operations (NA-40) has no comments on the subject directive.

**Suggested comment from Vanessa Scott for NA-70 Defense Nuclear Security**

1. There should be a definition of Personal Property somewhere in the beginning of the guide. Need to understand what is being managed and what items would be considered supplies/consumables.

2. Glossary is not in alphabetic order

**Response:**

*Accept with Modifications*

Personal Property was added into the definition and glossary was placed in alphabetic order

**Suggested comment from Diana Tamayo for NA-80 Counterterrorism and Counterproliferation**

No Comment

**Suggested comment from Henry Van Dyke for NA-General Counsel**

This package represents the official, consolidated comments of **H. VAN DYKE, DGC**

No Comment

**Suggested comment from Ruth LaTulippe for Nevada Field Office**

No Comment

**Suggested comment from Patricia Hartig for Nevada National Security Site - Wackenhut Services Inc.**

No Comment

**Suggested comment from Sharon O'Bryant for NNSA Production Office**

No comment.

**Suggested comment from Linell Carter for Pantex - BWXT Pantex, LLC**

"No Comment" from Mitch Miller, Pantex Property Department

**Suggested comment from Jennifer Bitsie for Sandia Field Office**

Sandia Field Office has no comments on this matter.

**Included comments:**

**SME pmontoy@sandia.gov**

No Comment

**Suggested comment from Jacquelyn Silva for Sandia National Laboratories**

**Included comments:**

**SME pmontoy@sandia.gov**

No Comment

**Suggested comment from Sandee Greene for Savannah River Field Office**

**Included comments:**

**SME roxanne.jump@nnsa.srs.gov**

No Comment

**SME timothy.fischer@nnsa.srs.gov**

No Comment

**SME rita.pernell@nnsa.srs.gov**

No Comment

**SME audrey.rischbieter@nnsa.srs.gov**

No Comment

**Suggested comment from PK Niyogi for Headquarters NE**

**Included comments:**

**SME schmidr@id.doe.gov**

No Comment

**Christie Melbihess for Idaho National Laboratory - NE**

No Comment

**Suggested comment from Christie Melbihess for Idaho National Laboratory - NE**

No Comment

**Suggested comment from David Neil for Idaho Operations Office (NE)**

**Included comments:**

**SME schmidr@id.doe.gov**

No Comment

**Christie Melbihess for Idaho National Laboratory - NE**

No Comment

**Suggested comment from Jennifer Kelley for Headquarters SC**

This package represents the official, consolidated comments of **Stephanie Short, Associate Deputy Director for Field Operations**

No Comment

**Suggested comment from Kathleen Ellis for Argonne National Laboratory**

No Comment

**Suggested comment from John Kasprovicz for Argonne Site Office**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Donna Spencer for Berkeley Site Office**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Aundrea Clifton for Brookhaven Site Office**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Lynette Kane for Chicago Office**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from David Baird for Fermi National Accelerator Laboratory**

No Comment

**Suggested comment from Tammy Welcome for Lawrence Berkeley Laboratory**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Regina Loy for Oak Ridge National Laboratory**

No Comment

**Suggested comment from Madelyn Wilson for Office of Scientific and Technical Information**

No Comment

**Suggested comment from Regina Zehm for Pacific Northwest Site Office**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Kyong Watson for SLAC National Accelerator Laboratory Site Office**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Scott Mallette for Thomas Jefferson Site Office**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

**Suggested comment from Cecelia Kenney for Headquarters AU (formerly HS)**

This package represents the official, consolidated comments of **Stephen Kirchhoff, Deputy Associate Under Secretary for Environment, Health, Safety and Security**

According to the DOE Order 251.1C, Departmental Directives Program, a guide is only to "Provide an acceptable, but not mandatory means for complying with requirements of an Order or rule." However, this guide contains requirements that are not addressed in DOE Order 580.1A. For example, in Section III, Chapter 2, paragraph 2.3, the following language is found:

### **"2.3 Precious Metals Control Officer**

Each DOE organization and contractor with precious metals designates a Precious Metals Control Officer (PMCO), in writing, that serves as the primary point of contact concerning precious metals control and management. The PMCO:

- Ensures the organization's precious metals activities meet Departmental requirements.
- Maintains an up-to-date list of the names of all precious metals custodians.
- Develops and issues current authorization lists of persons authorized by management to withdraw precious metals from stockrooms.
- Provides instructions and training to precious metals custodians and/or users as necessary to assure compliance with regulatory responsibilities.
- Ensures that physical inventories are performed as required by DOE O 580.1A and witnesses their completion.
- Performs periodic unannounced inspections of custodial precious metals stocks and records.
- Conducts annual reviews of precious metals to identify excess quantities.
- Prepares and submits to the BCPMSR an annual forecast of anticipated withdrawals from, and returns to, the program."

This position is not mentioned in DOE Order 580.1A, yet the Guide requires such an Officer to be designated with required duties. This is only one example. Recommend that the Guide be reviewed to ensure that no other mandatory requirements are included.

#### **Response:**

*Reject*

This guide is not mandatory. Page 1 of the page states that "This guide describes acceptable, but not mandatory means for complying with requirements. Guides are not to required documents etc.....

### **Major comment from Sara Frey for Western Area Power Administration**

After page 90 in Adobe pages it appears to be duplicate of adobe page number 61-88.

#### **Response:**

*Accept with Modifications*

Editorial correctionas were made

### **Suggested comment from Jennifer Ackerman for Headquarters HC**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

### **Suggested comment from John Wall for Headquarters CF**

This package represents the official, consolidated comments of **N/A - Comment package automatically submitted.**

No Comment

### **Suggested comment from Sharon Edge-Harley for Headquarters EA (Enterprise Assessment)**

This package represents the official, consolidated comments of **William A. Eckroade, Deputy Director, Office of Enterprise Assessments**

No Comment

SME [MGreene@ntc.doe.gov](mailto:MGreene@ntc.doe.gov) wrote:

**FORMATTING NOTE ONLY:**

**Comment:** The last 28 pages of the PDF document are duplicates of the previous 28 pages and minor editorial and/or misspelled words which we do not feel need further comment.

**FOREWORD**

**Major comment from Marilyn Jacobs for Headquarters EM**

comment being made by MP Jacobs on behalf of Melissa Rider, Acting Director for Procurement Planning:

Page numbers need to be inserted throughout.

**Response:**

*Accept with Modifications*

The pages have been inserted throughout

**Suggested comment from Marilyn Jacobs for Headquarters EM**

**Included comments:**

**SME [timothy.armstrong@srs.gov](mailto:timothy.armstrong@srs.gov)**

You are showing IV sections above but V sections are identified for review.

**Response:**

*Accept with Modifications*

Section V was removed

**Suggested comment from Tracy Williamson for Savannah River Operations Office (EM)**

**Included comments:**

**SME [timothy.armstrong@srs.gov](mailto:timothy.armstrong@srs.gov)**

You are showing IV sections above but V sections are identified for review.

**Response:**

*Accept with Modifications*

Section V was removed

**Suggested comment from Clarence Hinton for Y-12 National Security Complex - CNS**

**Included comments:**

**SME [hwm@y12.doe.gov](mailto:hwm@y12.doe.gov)**

No comments.

**Suggested comment from Jennifer Kelley for Headquarters SC**

At the back of the Guide, there is a follow-up section to Section IV that is a duplicate of IV but it does not have a section designation. However, within RevCom it is designated as Section V, but is a duplicate of Section IV. The duplicate section should be removed.

**Response:**

*Accept with Modifications*

The editorials were made on duplicates

**SECTION - I. CHAPTER 1. Insert Section Break Insert Paragraph Break Remove Break (36/p/MsoNormal/margin-bottom:12.0pt;text-align:center) DEFINITIONS AND ACRONYMS**

#### **Suggested comment from PK Niyogi for Headquarters NE**

##### **Included comments:**

**SME akersob@id.doe.gov**

In definitions section no definitions for sensitive property, precious metals, high-risk personal property, firearms, capital equipment or hazardous property. Where they left out for a reason? Might consider putting them in the definition section.

**Response:**

*Accept with Modifications*

Definitions are covered in the DOE Order 580.1A - Attachment 2. This Guide is a supporting document to the Order 580.1A. Firearms definition added to the 580.1A to read "*Firearms* means any weapon, silencer, or destructive device designed to, or readily convertible to, expel a projectile by the action of an explosive.

#### **Suggested comment from David Neil for Idaho Operations Office (NE)**

##### **Included comments:**

**SME akersob@id.doe.gov**

In definitions section no definitions for sensitive property, precious metals, high-risk personal property, firearms, capital equipment or hazardous property. Where they left out for a reason? Might consider putting them in the definition section.

**Response:**

*Accept with Modifications*

Definitions are covered in the DOE Order 580.1A - Attachment 2. This Guide is a supporting document to the Order 580.1A. Firearms definition added to the 580.1A to read "*Firearms* means any weapon, silencer, or destructive device designed to, or readily convertible to, expel a projectile by the action of an explosive.

#### **Major comment from Steve Duarte for Headquarters GC**

##### **Included comments:**

**SME Janet.Barsy@hq.doe.gov**

I don't believe that the terms "Export Controlled Information" or "Export Controlled Property" are used elsewhere in the proposed Guide, so the purpose of these definitions is not clear. Neither term is defined or used on the Acquisition Guide, Chapter 3-3 (January 2012). Section 3, Chapter 1 is titled "Export Controlled High Risk Personal Property". The term "High Risk Personal Property" is not defined in the proposed Guide or the Acquisition Guide. Section

Further, Section 6., Export Control "Carve Out" in the Guide, discusses "information" -- but appears to define such information differently than the proposed definition of "Export Controlled Information". If this term is to be used, suggest that origin of definition be determined/explained.

**Response:**

*Accept*

Export Controlled Information was removed

#### **Major comment from Jennifer Kelley for Headquarters SC**

Foreign Loan Definition: We request the following bullet be added to the list of actions that are not considered foreign loans:

- " Property provided in support of DOE funded projects or activities on foreign soil."

**Response:**

*Accept*

Property provided in support of DOE funded projects or activities on foreign soil was added per request

#### **Major comment from Steve Duarte for Headquarters GC**

##### **Included comments:**

**SME james.jurich@hq.doe.gov**

Need to define High Risk Personal Property

**Response:**

*Reject*

Definitions are covered in the DOE Order 580.1A - Attachment 2. This Guide is a supporting document to the Order 580.1A.

#### **Major comment from Marilyn Jacobs for Headquarters EM**

comment being included by MP Jacobs for Melissa Rider, Acting Director for Procurement Planning on 11/18 at 12:36pm

The FAR cite on the Property Administrator Appointments should not be FAR Subpart 1.6, because persons appointed to those positions are not contracting officers, they are performing COR-type functions on behalf of to assist the contracting officer. Therefore, the citation should be FAR 1.604.

**Response:**

*Reject*

P\OPMO or PA are not considered as contracting officers. They are appointed by CO to perform property management oversight on behalf of CO.

#### **Suggested comment from Cathy Tullis for Headquarters NA**

##### **Included comments:**

**SME lynn.brownell@nnsa.doe.gov**

41 USX 423 should be 41 USC 423

**Response:**

*Accept*

correction was made to read should be 41 USC 423

#### **Suggested comment from Derek LaHouse for NA-Management and Budget**

##### **Included comments:**

**SME lynn.brownell@nnsa.doe.gov**

41 USX 423 should be 41 USC 423

**Response:**

*Accept*

correction was made to read should be 41 USC 423

#### **Major comment from Steve Duarte for Headquarters GC**

##### **Included comments:**

**SME james.jurich@hq.doe.gov**

Personal Property is not defined in the Guide. Need to add a definition

**Response:**

*Reject*

Definition are covered in the DOE Order 580.1A - Attachment2. This Guide is a supporting document to the Order 580.1A

## Major comment from Marilyn Jacobs for Headquarters EM

### Included comments:

**SME Ronald.Rorer@srs.gov**  
Capitalize Alcohol in BATFE

**Response:**  
*Accept*

Alcohol was capitalized per request

## Major comment from Tracy Williamson for Savannah River Operations Office (EM)

### Included comments:

**SME Ronald.Rorer@srs.gov**  
Capitalize Alcohol in BATFE

**Response:**  
*Accept*

Alcohol was capitalized per request

## Major comment from Steve Duarte for Headquarters GC

### Included comments:

**SME Janet.Barsy@hq.doe.gov**

The terms "High Risk Personal Property" and "Sensitive Personal Property" should be defined. However, as written, the distinction between HRPP and sensiive personal property is not clear; how/why would such property be treated differently.

**Response:**  
*Reject*

Definition are covered in the DOE Order 580.1A - Attachment2. This Guide is a supporting document to the Order 580.1A

## Suggested comment from Cecelia Kenney for Headquarters AU (formerly HS)

Page 14, paragraph 1.3 - "UCNI - Unclassified Controlled Nuclear Information" is included in the list of acronyms, but it is not used anywhere else in the Guide. Recommend it be deleted from the list.

**Response:**  
*Accept*

Removed from guide per request "Unclassified Controlled Nuclear Information"

## CHAPTER 2. APPOINTMENTS

### Major comment from Sharon Edge-Harley for Headquarters EA (Enterprise Assessment)

SME [MGreene@ntc.doe.gov](mailto:MGreene@ntc.doe.gov) wrote:

Section - I, **Comment** - There is not a DOE O 361.1. There is a DOE O 361.1B, but it doesn't give a listing courses. Should Property Management Program Module be "Personal Property Management Care Development Program" IAW 361.1B?

Chapter 2, Paragraph 2.4-Nomination, 3<sup>rd</sup> & 4<sup>th</sup> bullets

(page 15);

**Response:**  
*Accept with Modifications*

Correction were made to read DOE O 361.1B

## Suggested comment from Marilyn Jacobs for Headquarters EM

### Included comments:

**SME timothy.armstrong@srs.gov**  
Remove the last indented dot

**Response:**  
*Accept*



Removed per request " The HCA or designee terminates the appointment by letter. As part of the termination process, the original letter or certificate issuing the appointment is destroyed or defaced".

#### **Suggested comment from Tracy Williamson for Savannah River Operations Office (EM)**

##### **Included comments:**

**SME timothy.armstrong@srs.gov**

Remove the last indented dot

##### **Response:**

*Accept*

Removed per request " The HCA or designee terminates the appointment by letter. As part of the termination process, the original letter or certificate issuing the appointment is destroyed or defaced".

#### **RECOMMENDATION AND APPROVAL FOR APPOINTMENT**

#### **CHAPTER 3. PERSONAL PROPERTY MANAGEMENT**

#### **Suggested comment from Marilyn Jacobs for Headquarters EM**

##### **Included comments:**

**SME renato.mercado@rl.doe.gov**

**3.3 Contractor Program***General*In order to implement the DOE personal property management program requirements outlined in DOE O 580.1A, contractors should establish and maintain personal property management systems that are DOE program and site-specific consistent with the terms of the contract, prescribed policies, procedures, regulations, statutes, instructions and directions from the Contracting Officer(CO). Contractors are accountable and responsible to safeguard and protect all DOE-owned personal property acquired by or provided to them, including property that they furnish to subcontractors also addressed in Chapter 5 of this Section. Contractors should maintain their personal property management systems in writing. A system is not considered approved until it is reviewed and **accepted approved** in writing by the DOE CO. In addition, the DOE CO reviews and approves in writing all significant revisions to an already accepted system.

##### **Response:**

*Accept*

corrected to read accepted

**SME Ronald.Rorer@srs.gov**

3.3 Contractor Program - General Third Paragraph - "A system is not considered approved until it is reviewed and approved in writing by the DOE CO." The PA/OPMO reviews the system, so I would suggest to add "by the DOE CO or designee."

##### **Response:**

*Reject*

PA/OPMO may review the property system; however the system approval should be in writing from the CO

#### **Suggested comment from Annette Erdman for Richland Operations Office**

##### **Included comments:**

**SME renato.mercado@rl.doe.gov**

**3.3 Contractor Program***General*In order to implement the DOE personal property management program requirements outlined in DOE O 580.1A, contractors should establish and maintain personal property management systems that are DOE program and site-specific consistent with the terms of the contract, prescribed policies, procedures, regulations, statutes, instructions and directions from the Contracting Officer(CO). Contractors are accountable and responsible to safeguard and protect all DOE-owned personal property acquired by or provided to them, including property that they furnish to subcontractors also addressed in Chapter 5 of this Section. Contractors should maintain their personal property management systems in writing. A system is not considered approved until it is reviewed and **accepted approved** in writing by the DOE CO. In addition, the DOE CO reviews and approves in writing all significant revisions to an already accepted system.

**Response:**

*Accept*

corrected to read accepted

**Suggested comment from Tracy Williamson for Savannah River Operations Office (EM)**

**Included comments:**

**SME Ronald.Rorer@srs.gov**

3.3 Contractor Program - General Third Paragraph - "A system is not considered approved until it is reviewed and approved in writing by the DOE CO." The PA/OPMO reviews the system, so I would suggest to add "by the DOE CO or designee."

**Response:**

*Reject*

PA/OPMO may review the property system; however the system approval should be in writing from the CO

**Suggested comment from Marilyn Jacobs for Headquarters EM**

**Included comments:**

**SME timothy.armstrong@srs.gov**

Suggested changes

OPMO/PA should perform an initial review of a contractor personal property management system within one year after the effective date of the contract, unless the contract is an extension, renewal or follow-on contract. ~~In that case, the established review schedule is followed.~~

The "within one year" initial review requirement may be extended when special circumstance that precludes completion of the initial review within one year of the effective date of the contract, after the OPMO/PA obtains the approval of the **CO**. ~~(Was "CO" not sure why it was spelled out)~~

When a system is conditionally approved or disapproved, the **OPMO/PA** or **CO** ~~should~~ **will** advise the contractor in writing of the deficiencies that need to be corrected. ~~and a A time corrective action schedule will be~~ established for completion of **identified deficiencies** ~~corrective actions~~.

**Response:**

*Accept*

Made corrections and revised per request

**Suggested comment from Tracy Williamson for Savannah River Operations Office (EM)**

**Included comments:**

**SME timothy.armstrong@srs.gov**

Suggested changes

OPMO/PA should perform an initial review of a contractor personal property management system within one year after the effective date of the contract, unless the contract is an extension, renewal or follow-on contract. ~~In that case, the established review schedule is followed.~~

The "within one year" initial review requirement may be extended when special circumstance that precludes completion of the initial review within one year of the effective date of the contract, after the OPMO/PA obtains the approval of the **CO**. ~~(Was "CO" not sure why it was spelled out)~~

When a system is conditionally approved or disapproved, the **OPMO/PA** or **CO** ~~should~~ **will** advise the contractor in writing of the deficiencies that need to be corrected. ~~and a A time corrective action schedule will be~~ established for completion of **identified deficiencies** ~~corrective actions~~.

**Response:**

*Accept*

Made corrections and revised per request

**Suggested comment from Cathy Tullis for Headquarters NA**

**Included comments:**

**SME lynn.brownell@nnsa.doe.gov**

3rd paragraph - fix spacing on acronym for CO and remove (Was "CO" not sure way it was spelled out).

**Response:**

*Accept*

corrected spacing removed "was CO not sure way it was spelled out"

#### **Suggested comment from Derek LaHouse for NA-Management and Budget**

##### **Included comments:**

**SME lynn.brownell@nnsa.doe.gov**

3rd paragraph - fix spacing on acronym for CO and remove (Was "CO" not sure way it was spelled out).

##### **Response:**

*Accept*

corrected spacing removed "was CO not sure way it was spelled out"

#### **CHAPTER 4. PRINCIPLES AND STANDARDS**

#### **Suggested comment from Jennifer Kelley for Headquarters SC**

Rather than "The physical inventory results should be reconciled with the property records and financial accounts and be reported to the CO/OPMO/PA within 30 days of the reconciliation." This should be consistent with DOE O 580.1A, which requires: "The contractor must submit inventory results and ... ..for acceptance within 60 days after concluding the inventory."

##### **Response:**

*Accept*

Correction was made to read 60 days

#### **Suggested comment from Jim Graham for Princeton Plasma Physics Laboratory**

Rather than "The physical inventory results should be reconciled with the property records and financial accounts and be reported to the CO/OPMO/PA within 30 days of the reconciliation.",

this should be consistent with O580.1A, which requires: "The contractor must submit inventory results and ... ..for acceptance within 60 days after concluding the inventory."

#### **Suggested comment from Marilyn Jacobs for Headquarters EM**

##### **Included comments:**

**SME timothy.armstrong@srs.gov**

DOE personal property should be used only in the performance of official **Government** work **or as authorized by the agency.**  
~~for the United~~

##### **Response:**

*Accept*

Correction made per request to read "DOE personal property should be used only in the performance of official Government work or as authorized by the agency"

#### **Suggested comment from Tracy Williamson for Savannah River Operations Office (EM)**

##### **Included comments:**

**SME timothy.armstrong@srs.gov**

DOE personal property should be used only in the performance of official **Government** work **or as authorized by the agency.**  
~~for the United~~

##### **Response:**

*Accept*

Correction made per request to read "DOE personal property should be used only in the performance of official Government work or as authorized by the agency"

#### **CHAPTER 5. FEDERAL OVERSIGHT FOR OFF-SITE CONTRACTOR FACILITIES**

#### **CHAPTER 6. REPORTS**

#### **SECTION - II. CHAPTER 1. LABORATORY EQUIPMENT DONATION PROGRAM (LEDP)**

#### **Suggested comment from Marilyn Jacobs for Headquarters EM**

**Included comments:**

**SME timothy.armstrong@srs.gov**  
I would add the PA for approval as well.

**Response:**  
*Accept*

Revised and added PA for approval

**Suggested comment from Tracy Williamson for Savannah River Operations Office (EM)**

**Included comments:**

**SME timothy.armstrong@srs.gov**  
I would add the PA for approval as well.

**Response:**  
*Accept*

Revised and added PA for approval

**CHAPTER 2. OTHER EDUCATION ENHANCEMENT PROGRAMS**

**CHAPTER 3. ECONOMIC DEVELOPMENT PROPERTY**

**GROUP 1 LOCAL DOE SCREENING**

**Suggested comment from Steve Duarte for Headquarters GC**

**Included comments:**

**SME james.jurich@hq.doe.gov**  
Recommend defining acronym FSCG.

**Response:**  
*Reject*

FSCG is identified in the acronyms section

**GROUP 2 EXPEDITED DOE SCREENING**

**SECTION - III. CHAPTER 1. EXPORT CONTROLLED HIGH RISK PERSONAL PROPERTY**

**Major comment from Steve Duarte for Headquarters GC**

**Included comments:**

**SME Janet.Barsy@hq.doe.gov**  
There is no definition of High Risk Personal Property; this should be defined upfront here or in the definition section.

**Response:**  
*Reject*

Definition are covered in the DOE Order 580.1A - Attachment2. This Guide is a supporting document to the Order 580.1A

**Suggested comment from Jennifer Kelley for Headquarters SC**

Recommend utilizing the terminology of "Equivalency/Exemption."

**Response:**  
*Reject*

The term used in the Guide "deviate" does encompass other terminology such as Equivalency/Exemption.

**Major comment from Steve Duarte for Headquarters GC**

**Included comments:**

**SME james.jurich@hq.doe.gov**

There is no legal basis for a Guide to impose a requirement on a financial assistance recipient. DOE Order 251.1C states that a Guide provides only an acceptable, non-mandatory means for complying with an Order or Rule. The corresponding Order on Personal Property does not directly apply to financial assistance recipients and does not appear to impose requirements on DOE contracting officers regarding assistance recipients above and beyond those required by statute or regulation. Unless a clear

citation for the requirements related to the statement can be identified, remove the language.

**Response:**

*Reject*

This guide is not mandatory. The page 1 of the Guide states " This Guide describes acceptable, but not mandatory means for complying with requirements. Guides are not to be construed as requirements in any audit or appraisal for compliance with associated rule or directives.

**Major comment from Steve Duarte for Headquarters GC**

**Included comments:**

**SME james.jurich@hq.doe.gov**

There is no legal basis for a Guide to impose a requirement on a financial assistance recipient. DOE Order 251.1C states that a Guide provides only an acceptable, non-mandatory means for complying with an Order or Rule. The corresponding Order on Personal Property does not directly apply to financial assistance recipients and does not appear to impose requirements on DOE contracting officers regarding assistance recipients above and beyond those required by statute or regulation. Unless a clear citation for the requirements related to the statement can be identified, remove the language.

**Response:**

*Reject*

This guide is not mandatory. The page 1 of the Guide states " This Guide describes acceptable, but not mandatory means for complying with requirements. Guides are not to be construed as requirements in any audit or appraisal for compliance with associated rule or directives.

**Suggested comment from Steve Duarte for Headquarters GC**

**Included comments:**

**SME Janet.Barsy@hq.doe.gov**

Re "Local Export Control" -- export control should not be capitalized as it is not a defined term.

**Response:**

*Reject*

Export Control is defined in the 580.1A

**Major comment from Steve Duarte for Headquarters GC**

**Included comments:**

**SME Janet.Barsy@hq.doe.gov**

I don't see a sample Export Restriction Notice in the Acquisition Guide, Chapter 3.3.

**Response:**

*Accept with Modifications*

Editorial were made to read " The Export Restriction Notice from the sites or financial assistance recipient organizations property management system, should be included in all transfers, sales, or other offerings (Refer to DOE CFR 109-1.5303)

**CHAPTER 2. PRECIOUS METALS**

**Suggested comment from Marilyn Jacobs for Headquarters EM**

**Included comments:**

**SME timothy.armstrong@srs.gov**

A repeat of below so I would change to read:

**2.2 DOE Business Center for Precious Metals Sales and Recovery**

**Suggested comment from Tracy Williamson for Savannah River Operations Office (EM)**

**Included comments:**

**SME timothy.armstrong@srs.gov**

A repeat of below so I would change to read:

**2.2 DOE Business Center for Precious Metals Sales and Recovery**

**CHAPTER 3. SENSITIVE PERSONAL PROPERTY**

## Major comment from Steve Duarte for Headquarters GC

### Included comments:

**SME Janet.Barsy@hq.doe.gov**

The term "Sensitive Personal Property" should be defined here or in the definition section.

**Response:**

*Reject*

Definitions are covered in the order 580.1A. This guide is supporting a document to the Order 580.1A

## Major comment from Steve Duarte for Headquarters GC

### Included comments:

**SME Janet.Barsy@hq.doe.gov**

It isn't clear why the example used references HRPP -- this suggests HRPP and sensitive personal property are the same -- which may be correct. If both terms are used, the distinction between them should be clear. It would seem the nuclear material discussed in the sample letter qualifies as both HRPP and sensitive personal property.

**Response:**

*Reject*

Definitions are covered in the order 580.1A. This guide is supporting a document to the Order 580.1A attachment 2

## SECTION - IV. CHAPTER 1. LOANING PERSONAL PROPERTY

### Suggested comment from Jennifer Kelley for Headquarters SC

Paragraph 1.2. This paragraph is also found in the Order main body section 4i(1)(d) and CRD paragraph 5h(1)(d): Instead of repeating order language, please discuss what does and does not meet this requirement with examples.

**Response:**

*Reject*

Example can be provided by the OPMO at the local level due to each site has different perspective and or assets

## CHAPTER 2. LOSS, DAMAGE, OR DESTRUCTION OF PERSONAL PROPERTY

### Suggested comment from Marilyn Jacobs for Headquarters EM

### Included comments:

**Annette Erdman for Richland Operations Office**

Any suggested form that can be use to retire a property?

**Response:**

*Reject*

This is done at the local site with direction from the CO/OPMO/PA

### Suggested comment from Annette Erdman for Richland Operations Office

Any suggested form that can be use to retire a property?

**Response:**

*Reject*

This is done at the local site with direction from the CO/OPMO/PA

## CHAPTER 3. IDLE EQUIPMENT

## CHAPTER 4. DISPOSITION OF EXCESS AND SURPLUS PERSONAL PROPERTY

### Suggested comment from Marilyn Jacobs for Headquarters EM

### Included comments:

**SME timothy.armstrong@srs.gov**

The HFE or HFE **their** designated individual approves transfers of property to a grant or cooperative agreement.

**Response:**

Accept

Change was made to read HFE per request for 4.6

#### Suggested comment from Tracy Williamson for Savannah River Operations Office (EM)

##### Included comments:

**SME timothy.armstrong@srs.gov**

The HFE or HFE **their** designated individual approves transfers of property to a grant or cooperative agreement.

**Response:**

Accept

Change was made to read HFE per request for 4.6

#### Suggested comment from Cathy Tullis for Headquarters NA

##### Included comments:

**Vanessa Scott for NA-70 Defense Nuclear Security**

Concern with the following language:

##### **Classified Personal Property**

*Classified Personal Property that is excess to DOE is sanitized of all characteristics that cause it to be classified, as determined by the cognizant program office, prior to its disposition. The declassification should be accomplished in a manner that preserves any civilian utility or commercial value of the personal property.*

*The cognizant program office certifies in writing that the personal property was declassified.*

Unsure what Classified Personal Property is and the instructions for declassifying it do not correspond with the requirements of the declassification program.

**Response:**

Reject

The guide states that the cognizant program office responsibility for classification of the personal property that excess. Sites have their own classification office.

#### Suggested comment from Vanessa Scott for NA-70 Defense Nuclear Security

Concern with the following language:

##### **Classified Personal Property**

*Classified Personal Property that is excess to DOE is sanitized of all characteristics that cause it to be classified, as determined by the cognizant program office, prior to its disposition. The declassification should be accomplished in a manner that preserves any civilian utility or commercial value of the personal property.*

*The cognizant program office certifies in writing that the personal property was declassified.*

Unsure what Classified Personal Property is and the instructions for declassifying it do not correspond with the requirements of the declassification program.

**Response:**

Reject

The guide states that the cognizant program office responsibility for classification of the personal property that excess. Sites have their own classification office.

#### Major comment from Marilyn Jacobs for Headquarters EM

##### Included comments:

**SME Ronald.Rorer@srs.gov**

Seems to be a discrepancy in the third paragraph. It states that, "Firearms not transferred or donated must be destroyed and sold as scrap." However, the next sentence states that "Firearms may not be donated."

**Response:**

Accept with Modifications

There is no discrepancy, GSA may donate firearms; however DOE sites are not authorized to donate firearms or ammunitions. Editorial correction was made to read " GSA may donate certain classes of surplus firearms or ammunition to State and local government activities whose primary function is the enforcement of applicable Federal, State and/or local laws and whose

compensated law enforcement officers have the authority to apprehend and arrest. Firearms not transferred or donated must be destroyed and sold as scrap. For additional guidance on disposition and destruction of firearms, see 41 CFR 101-42.1102-10 and 41 CFR 102-36.375".

#### Major comment from Tracy Williamson for Savannah River Operations Office (EM)

##### Included comments:

**SME Ronald.Rorer@srs.gov**

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**Response:**

*Accept with Modifications*

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#### Suggested comment from Sharon Edge-Harley for Headquarters EA (Enterprise Assessment)

SME [MGreene@ntc.doe.gov](mailto:MGreene@ntc.doe.gov) wrote:

Section - IV, Chapter 4, Paragraph 4.7-  
DOE Firearm Utilization, Transfer and  
Donation

(page 76);

**Comment** - The DRMS requires special authorized access to the demilitarization sites. How is it obtained? Suggest direction be added on who to contact and by whom in the organization, i.e. F. Oversight or Contractor.

#### Major comment from Cecelia Kenney for Headquarters AU (formerly HS)

The Officially Designated Federal Security Authority (ODFSA) should be included in the approval process alongside OPMO.

**Response:**

*Reject*

Prior to declaring property as surplus, it is reviewed for HRPP and hence no additional approval should be required from ODFSA.

#### Suggested comment from Sharon Edge-Harley for Headquarters EA (Enterprise Assessment)

SME [MGreene@ntc.doe.gov](mailto:MGreene@ntc.doe.gov) wrote:

Section - IV, Chapter 4, Paragraph 4.17-  
Disposal of Small Electronic Personal  
Property and Related Accessories (page  
81);

**Comment** - Add paragraph on the donation through UNICOR as a certified electronics recycler. Logistics Supervisor can write that paragraph if requested.

**Response:**

*Reject*

Specifics can be provided by the OPMO based on the type of contract.

### CHAPTER 5. PERSONAL PROPERTY IN A MIXED FACILITY

### CHAPTER 6. DISPOSAL OF PERSONAL PROPERTY IN FOREIGN AREAS

### SECTION V. CHAPTER 1. LOANING PERSONAL PROPERTY

#### Suggested comment from PK Niyogi for Headquarters NE

##### Included comments:

**SME akersob@id.doe.gov**

Chapter V appears to be the same as Chapter IV? If so remove Chapter V.



**Response:**

*Accept with Modifications*

Chapter V was removed

**Suggested comment from David Neil for Idaho Operations Office (NE)****Included comments:**

**SME akersob@id.doe.gov**

Chapter V appears to be the same as Chapter IV? If so remove Chapter V.

**Response:**

*Accept with Modifications*

Chapter V was removed

**Major comment from Jennifer Kelley for Headquarters SC**

Paragraph 1.2: We request the following sentence be added:

"Property provided in support of DOE funded projects or activities at domestic locations other than the Federal Facility/Laboratory/Site does not require a domestic loan."

**Response:**

*Reject*

Even if the property is provided in support of a DOE project, it still should be considered as a loan.

**CHAPTER 2. LOSS, DAMAGE, OR DESTRUCTION OF PERSONAL PROPERTY****CHAPTER 3. IDLE EQUIPMENT****CHAPTER 4. DISPOSITION OF EXCESS AND SURPLUS PERSONAL PROPERTY****Major comment from Marilyn Jacobs for Headquarters EM****Included comments:**

**SME Ronald.Rorer@srs.gov**

Paragraph three is conflicting in that it states Firearms not transferred or donated must be destroyed and sold as scrap and the following sentence states that Firearms may not be donated.

**Response:**

*Accept with Modifications*

There is no conflict. GSA is authorized to donate firearm; however DOE site may not donate firearms or ammunitions. Editorial correction were made to read" GSA may donate certain classes of surplus firearms or ammunition to State and local government activities whose primary function is the enforcement of applicable Federal, State and/or local laws and whose compensated law enforcement officers have the authority to apprehend and arrest. Firearms not transferred or donated must be destroyed and sold as scrap. For additional guidance on disposition and destruction of firearms, see 41 CFR 101-42.1102-10 and 41 CFR 102-36.375".

**Major comment from Tracy Williamson for Savannah River Operations Office (EM)****Included comments:**

**SME Ronald.Rorer@srs.gov**

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**Response:**

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**Suggested comment from Jennifer Kelley for Headquarters SC**

There appears to be an overuse of the term "donated," and this section may need to be rewritten if it is true that "firearms and

ammunition MAY NOT be donated."

#### **Suggested comment from Jennifer Kelley for Headquarters SC**

Did not see anything on this list about periodic inventories. Information should be added.

**Response:**

*Accept with Modifications*

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**Response:**

*Reject*

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#### **CHAPTER 5. PERSONAL PROPERTY IN A MIXED FACILITY**

#### **CHAPTER 6. DISPOSAL OF PERSONAL PROPERTY IN FOREIGN AREAS**